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Reviewed for Addressee
Corres. Control RFP

7/29/94 ps
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

FD-16502 (Rev. 6-94)

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

' JUL 28 1994

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Facilities Unit Leader
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

The U.S. Department of Energy, Rocky Flats Field Office (DOE/RFFO) is in receipt of your facsimile dated July 14, 1994, regarding the milestone extension request for the Industrial Area Interim Measure/Interim Remedial Action/Decision Document (IA IM/IRA/DD).

The agency's proposed milestones place a tremendous burden on the project schedule and resources. However, DOE accepts, in principle, the new milestone dates as previously proposed in your letter. The DOE will achieve the proposed milestones if the conditions set forth in this letter are accepted by the Colorado Department of Public Health and Environment. We consider the aforementioned conditions as being restrictive but necessary to allow DOE to meet the proposed schedule.

The request for a ten day document review prior to the public comment period is beyond the five days currently reflected in our original project schedule reviewed by the regulators. Since the Interagency Agreement does not specify a required length of time for this review, DOE/RFFO will deliver the Draft Final IA IM/IRA/DD to the agencies on August 26, 1994, five days prior to the public comment period. In addition, the project schedule does not allow for document revision based on agency comments prior to public release, therefore, it is expected that the regulators' comments will be addressed as part of the public comment period.

The Draft Responsiveness Summary (RS) will be submitted on November 2, 1994, however, comments received after October 18, 1994, will not be addressed in the Draft RS to allow sufficient time for the development of adequate comment responses. Comments received after October 18, 1994, will be addressed in the final RS to be submitted on November 23, 1994.

ADMIN RECORD

A-0013-000155

JUL 28 1994

J. Schieffelin
94-DOE-08163

The DOE/RFFO would like to respond to the regulator's contention that a detailed schedule for the revision of the Draft Proposed IM/IRA was informally delivered to the regulators which outlined DOE needing only seven weeks for "Pond IM/IRA Inclusion." It is worth remembering that unless correspondence is officially transmitted, it is preliminary information to be used for discussion purposes only and does not constitute a formal commitment by DOE. In addition, we would like to clarify the regulators statement that a month ago they were advised that their comments had already been resolved. Comment resolution is not the same as document revision. In general document revision does not begin until acceptance of the comment resolutions have been received. This is obviously not true for every comment, however, it is important to understand that comment resolutions which address programmatic issues require acceptance and approval before the document may be revised to reflect these resolutions.

If you have any questions regarding these matters, please contact Regina Sarter at 966-7252.


Steve Slaten
IAG Coordinator

cc:
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J. Burd, AIG, RFFO
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